

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
STEWARD HEALTH CARE SYSTEM	§	Case No. 24-90213 (CML)
LLC, et al.,	§	
	§	(Jointly Administered)
Debtors.¹	§	Re: Docket No. 225
	§	

**CERTIFICATE OF NO OBJECTION
REGARDING MOTION OF DEBTORS FOR ENTRY OF ORDER
AUTHORIZING DEBTORS TO EMPLOY PROFESSIONALS USED IN
ORDINARY COURSE OF BUSINESS EFFECTIVE AS OF PETITION DATE**

1. On May 11, 2024, Steward Health Care System LLC and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), filed the *Motion of Debtors for Entry of Order Authorizing Debtors to Employ Professionals Used in Ordinary Course of Business Effective as of Petition Date* (Docket No. 225) (the “**Motion**”),² with a proposed order granting the relief requested in the Motion (the “**Proposed Order**”), attached thereto as Exhibit A. Objections to the Proposed Order were required to be filed and served on or prior to June 3, 2024 (the “**Objection Deadline**”).

2. In accordance with paragraph 44 of the *Procedures for Complex Cases in the Southern District of Texas*, the undersigned counsel files this Certificate of No Objection and represents to the Court that (i) the Objection Deadline has passed, (ii) the undersigned counsel is

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/Steward>. The Debtors’ service address for these chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

unaware of any objection to the Motion, and (iii) the undersigned counsel has reviewed the Court's docket and no objection to the Motion appears thereon.

3. The Debtors received informal comments from the Official Committee of Unsecured Creditors and made corresponding revisions to the Proposed Order. A revised Proposed Order is annexed hereto as **Exhibit A** (the "**Revised Proposed Order**"). A redline of the Revised Proposed Order marked against the Proposed Order is annexed hereto as **Exhibit B**.

4. Therefore, the Debtors respectfully request entry of the Revised Proposed Order.

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Dated: June 10, 2024
Houston, Texas

/s/ Clifford W. Carlson
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*Attorneys for Debtors and Debtors in
Possession*

Certificate of Service

I hereby certify that on June 10, 2024, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas, and will be served as set forth in the Affidavit of Service to be filed by the Debtors' claims, noticing, and solicitation agent.

/s/ Clifford W. Carlson
Clifford W. Carlson

Exhibit A

Revised Proposed Order